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Attorneys for Trans'-Global LLC, a California
 limited liability company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

TRANS'-GLOBAL LLC, a California limited
 liability company,

Plaintiff,

vs.

LIA DETOMASI; MARIO P. DETOMASI; LORI
 THORNTON; JEFFREY DONATI; DANIEL
 DONATI; MARCIA M. MELNIKOFF;
 LAWRENCE BERTOLUCCI; LIA DETOMASI
 as trustee of THE BERTHA A. DONATI TRUST
 FBO MARC DONATI; LIA DETOMASI and
 MARIO P. DETOMASI as trustees of THE
 DETOMASI FAMILY TRUST u/a/d June 28,
 2005; LORI THORNTON and LIA DETOMASI,
 as trustees of THE BERTHA DONATI TRUST
 u/a/d September 30, 1996; MARC DONATI and
 VICKIE DONATI, as trustees of THE BERTHA
 A. DONATI TRUST; PAUL DONATI, ELISA M.
 DONATI KLUNIS and STEVE DONATI, as
 trustees of THE JULIO A. DONATI FAMILY
 TRUST u/a/d June 21, 2002; MARCIA M.
 MELNIKOFF as trustee of the TESTAMENTARY
 TRUST UNDER THE WILL OF JOSEPHINE
 BERTOLUCCI; MARCIA M. MELNIKOFF and
 LAWRENCE BERTOLUCCI as trustees of THE
 LAWRENCE R. BERTOLUCCI REVOCABLE
 LIVING TRUST dated June 6, 2007; KI MOON
 HONG; MYUNG S. HONG; SEO OK OH; SOOK
 OH, SUN YE OH, SUMI KIMURA, GEORGE
 KIMURA and DOES 1-25, inclusive,

Defendants.

**AND ALL RELATED CROSS-CLAIMS and
 COUNTER-CLAIMS**

Case No. C13-2149 WHO

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE AND
 ORDER**

Date: January 21, 2014
 Time: 2:00 p.m.
 Crtrm: 2

Honorable William H. Orrick

Wendel, Rosen, Black & Dean LLP
 1111 Broadway, 24th Floor
 Oakland, California 94607-4036

1 WHEREAS, the parties previously stipulated, and this court entered an order, continuing
2 the case management conference from October 15, 2013 to January 21, 2014 to allow the parties
3 to further investigate the status of potential insurance coverage, to allow the plaintiffs to obtain an
4 estimate of the investigation and remediation costs associated with the contamination at the
5 property and to allow certain cross-defendants time to respond;

6 WHEREAS, certain parties jointly retained an insurance archaeologist to investigate the
7 potential for insurance coverage. The investigation is ongoing, but information obtained by that
8 research has resulted in additional tenders being made to insurance carriers, although responses
9 from at least one carrier is still outstanding;

10 WHEREAS, the plaintiff's consultant conducted additional soil and groundwater
11 investigation, is preparing a bid package to obtain bids for the proposed soil remediation and plans
12 to obtain bids in or around February 2014;

13 WHEREAS, Thomas G. Palmer, Jr., who was recently added as a cross-defendant, filed his
14 responsive pleading, a cross-complaint and counterclaim on January 8, 2014;

15 WHEREAS, the parties, except for Thomas G. Palmer, Jr., have complied with the Federal
16 Rule of Civil Procedure Rule 26(a)(1) Initial Disclosure and Rule 26(f) meet and confer
17 requirements;

18 WHEREAS, the undersigned parties agree that postponing the case management
19 conference for approximately 90 days will allow additional time for further investigation into the
20 availability of insurance coverage, the preparation of responsive pleadings and to obtain an
21 estimate of future investigation and remediation costs, before the parties incur further litigation
22 and discovery costs;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties through
24 their respective counsel that the Case Management Conference currently scheduled for January
25 21, 2014 at 2 p.m. in Courtroom 2 of this Court may be continued with the Court's approval until a
26 time after April 15, 2014 that is convenient to the Court.

27 It is, therefore, respectfully requested that the Court order this matter to be continued until
28 after April 15, 2014 and that the ADR Conference, presently set for January 14, 2014, also be

continued to a mutually agreeable date for the parties and the ADR Program Director.

DATED: January 10, 2014

WENDEL, ROSEN, BLACK & DEAN LLP

By: /s/ Gregory C. Brandt
Greggory C. Brandt
Attorneys for Trans'-Global LLC, a California
limited liability company

DATED: January 9, 2014

ANDERLINI & MCSWEENEY LLP

By: /s/ Brian J. Sweeney
Brian J. Sweeney
Attorneys for Steven Donati, Paul Donati, Elisa
Donati Kunis and Marcia Melnikoff

DATED: January 10, 2014

BOWLES & VERNA

By: /s/ Ethan K. Friedman
Ethan K. Friedman
Attorneys for Lia DeTomasi, Mario DeTomasi,
Lori Thornton and Daniel Donati

DATED: January 10, 2014

BERLINER COHEN

By: /s/ Ralph Swanson
Ralph Swanson
Attorneys for Sumi Kimura

Wendel, Rosen, Black & Dean LLP
1111 Broadway, 24th Floor
Oakland, California 94607-4036

1 DATED: Janaury 10, 2014

HUNSUCKER GOODSTEIN PC

2
3 By: /s/ Brian Zagon
4 Brian Zagon
5 Attorneys for Ki Moon Hong and Myung S. Hong


6 DATED: Janaury 9, 2014

LAW OFFICES OF MICHAEL D. McLACHLAN,
7 APC

8
9 By: /s/ Michael D. McLachlan
10 Michael D. McLachlan
11 Attorneys for Thomas G. Palmer, Jr.

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13 **ORDER**

14
15 Having reviewed the parties' Stipulation, the requested further delay in holding the initial
16 Case Management Conference is granted in part. The Case Management Conference in this
17 matter currently scheduled for January 24, 2014 at 2:00 p.m. is continued until **March 4, 2014** at 2
18 p.m. in Courtroom 2. The parties shall file a Joint Case Management Statement in accordance
19 with the Local Rules on or before February 25, 2014. Further delay is not warranted.
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23 Honorable William H. Orrick
24 Judge of the Superior Court
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